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6 Attorneys for HARRAH'S ENTERTAINMENT, INC.; HARRAH'S OPERATING COMPANY,
INC.; HARRAH'S MARKETING SERVICES CORPORATION; HARRAH'S LAUGHLIN,
7 INC.; HARRAH'S LICENSE COMPANY, LLC; and HBR REALTY COMPANY, INC.

8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
11

12 JAMES M. KINDER,
13 Plaintiff,

14 vs.

15 HARRAH'S ENTERTAINMENT, INC.;
HARRAH'S OPERATING COMPANY, INC.;
16 HARRAH'S MARKETING SERVICES
CORPORATION; HARRAH'S LICENSE
17 COMPANY, LLC; HARRAH'S LAUGHLIN,
INC.; HBR REALTY COMPANY, INC. and
18 DOES 1 through 100, inclusive,

19 Defendants.
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CASE NO. 07-CV-2132-DMS (AJB)
[Consolidated with 07 CV 2226 DMS (POR)]

Judge: Hon. Dana M. Sabraw
Mag. Judge: Hon. Anthony J. Battaglia

NOTICE OF MOTION AND MOTION BY
DEFENDANTS TO REMAND ACTION TO
STATE COURT DUE TO LACK OF
DIVERSITY JURISDICTION

ACCOMPANYING DOCUMENTS:
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
RONALD R. GIUSSO; REQUEST FOR
JUDICIAL NOTICE

Date: June 13, 2008
Time: 1:30 p.m.
Courtroom: 12

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1 TO PLAINTIFF AND HIS ATTORNEY OF RECORD:

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3 NOTICE IS HEREBY GIVEN that on June 13, 2008, at 1:30 p.m. in Courtroom 12 of the
4 above-entitled Court, located at 880 Front Street, San Diego, California 92101-8900, HARRAH'S
5 ENTERTAINMENT, INC., HARRAH'S OPERATING COMPANY, INC.; HARRAH'S
6 MARKETING SERVICES CORPORATION; HARRAH'S LAUGHLIN, INC.; HARRAH'S
7 LICENSE COMPANY, LLC; and HBR REALTY COMPANY, INC. will and hereby do move
8 this Court for an order to remand this action to the Superior Court of California based on this
9 Court's lack of diversity jurisdiction.

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11 The motion is based on this notice of motion, the memorandum of points and authorities,
12 the declaration of Ronald R. Giusso, the pleadings and papers on file herein, and upon such other
13 matters as may be presented to the Court at the time of the hearing.

14 SHEA STOKES ROBERTS & WAGNER, ALC

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16 Dated: May 13, 2008

17 By: s/Ronald R. Giusso
18 Maria C. Roberts
19 Ronald R. Giusso
20 Attorneys for HARRAH'S ENTERTAINMENT,
21 INC.; HARRAH'S OPERATING COMPANY,
22 INC.; HARRAH'S MARKETING SERVICES
23 CORPORATION; HARRAH'S LAUGHLIN,
24 INC.; HARRAH'S LICENSE COMPANY, LLC;
25 and HBR REALTY COMPANY, INC.
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